

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BALSHE LLC and THE SIMON LAW FIRM,)	
)	
Plaintiffs,)	Case No. 08 CV 3256
)	
v.)	Judge James B. Zagel
)	
ALAN J. ROSS and SAVE ASSOCIATES,)	Magistrate Judge Susan E. Cox
)	
Defendants.)	

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs Balshe LLC ("Balshe") and The Simon Law Firm (the "Simon Firm") (collectively, "Plaintiffs"), by their attorneys, Novack and Macey LLP, pursuant to Rule 65 of the Federal Rules of Civil Procedure, respectfully move for entry of a Preliminary Injunction against Defendants Alan J. Ross ("Ross") and SAVE Associates ("SAVE") (collectively, "Defendants") to:

- (a) Enjoin Ross and SAVE from disseminating any information disclosed by Balshe and/or the Simon Firm pursuant to the Non-Disclosure Agreement described within, and attached to, Plaintiffs' Verified Complaint;
- (b) Enjoin Ross and SAVE from transferring any interest in United States Patent No. 5,974,390;
- (c) Enjoin Ross and SAVE from allowing any interest either of them possesses in United States Patent No. 5,974,390, including an interest they hold in the AXA '390 Patent Interest, to lapse; and
- (d) Grant Plaintiffs such other and further relief as the Court deems appropriate.

WHEREFORE, for the reasons set forth in their contemporaneously filed Plaintiffs' Memorandum Of Law In Support Of Their Motion For Preliminary Injunction, Balshe and the Simon Firm request that the requested preliminary injunction be granted and that the Court grant them such other relief as it deems appropriate.

BALSHE LLC and THE SIMON LAW FIRM

By: /s/ Richard L. Miller II
One of Their Attorneys

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CERTIFICATE OF SERVICE

I, Richard L. Miller II, an attorney, hereby certify that I caused a copy of the foregoing Plaintiffs' Motion For Preliminary Injunction to be served upon the following individual via electronic means pursuant to Electronic Case Filing (ECF) procedures:

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on this 9th day of June 2008.

/s/ Richard L. Miller II

Richard L. Miller II